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## **TYSON & MENDES LLP** 1 THOMAS E. MCGRATH Nevada Bar No. 7086 2 Email: tmcgrath@tysonmendes.com RACHEL J. HOLZER 3 Nevada Bar No. 11604 Email: rholzer@tysonmendes.com 4 3960 Howard Hughes Parkway, Suite 600 Las Vegas, Nevada 89169 5 Tel: (702) 724-2648 Fax: (702) 938-1048 6 Attorneys for Defendant Privilege Underwriters 7 Reciprocal Exchange a/k/a/ PURE UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 10 SLOBODANKA DJORDJEVIC-MIKIC, Case No. 2:17-cv-02667-JCM-CWH individually, 11 Plaintiff, STIPULATION AND ORDER TO EXTEND DEADLINES PENDING 12 VS. **MEDIATION** 13 PRIVILEGE UNDERWRITERS RECIPROCAL (FIRST REQUEST) EXCHANGE a/k/a PURE; DOES I through X 14 and ROE CORPORATIONS I through X, 15 inclusive, Defendants. 16

Plaintiff, by and through her undersigned counsel, and Defendant, by and through its undersigned counsel, hereby stipulate and agree to extend any and all pending deadlines, including the time to file the Joint Pretrial Order, for the following reasons:

- On April 10, 2019, Defendant filed its Motion for Partial Summary Judgment [ECF. 1. No. 42]. The Motion is still pending and no ruling has been made.
- 2. The Parties have agreed to participate in a mediation, which the parties are currently working to schedule before the Honorable Jackie Glass with Advanced Resolution Management. The parties are expected to select a mediation date in September, 2019, which is the mediator's soonest availability. Therefore, in the interest of allowing the parties to attempt resolution before expending additional resources in this matter, the parties respectfully request that any and all pending deadlines be extended, including the deadline concerning the joint pretrial order. An

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extension will help to conserve the Court's resources as well as the parties'. Accordingly, to help facilitate the parties' attempt at resolving this matter, including preserving costs and resources, the parties respectfully request that the Court extend all deadlines in this action, and hereby STIPULATE AND AGREE AS FOLLOWS:

- A. That all pending deadlines be extended, including the deadline concerning the joint pretrial order, while the parties attempt mediation, which the parties anticipate will take place in September of 2019 unless a sooner date becomes available.
- В. The parties will promptly notify the Court of the result of the mediation within five (5) business days of the mediation so that the Court may take appropriate action.

The parties submit this stipulation in good faith, and not for purposes of undue delay.

## IT IS SO STIPULATED.

DATED this 4<sup>th</sup> day of June 2019. DATED this 4<sup>th</sup> day of June 2019. NAQVI INJURY LAW TYSON & MENDES LLP

/s/ Elizabeth E. Coleman FARHAN R. NAQVI Nevada Bar No. 8589 ELIZABETH E. COLEMAN Nevada Bar No. 12350 9500 West Flamingo Road, Suite 104 Las Vegas, Nevada 89147 Attorneys for Plaintiff Slobodanka Diordievic-Mikic

/s/ Rachel J. Holzer THOMAS E. MCGRATH Nevada Bar No. 7086 RACHEL J. HOLZER Nevada Bar No. 11604 3960 Howard Hughes Parkway, Suite 600 Las Vegas, Nevada 89169 Tel: (702) 724-2648 Attorneys for Defendant Privilege Underwriters Reciprocal Exchange a/k/a/ **PURE** 

IT IS SO ORDERED

UNITED STATES MAGISTRAIT

June 7, 2019

DATED:

IT IS HEREBY ORDERED that the deadline to file the joint pretrial order is suspended until 30 days after the court's decision on the pending dispositive motion.